

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

V.

**NORSTRA ENERGY INC., GLEN LANDRY,
and ERIC DANY,**

Defendants.

15 Civ. 4751 (WHP)

ECF

**DECLARATION OF JORGE G. TENREIRO IN SUPPORT OF
PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S
MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Jorge G. Tenreiro, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of the State of New York and a member of the bar of this Court. I am employed as Senior Counsel in the New York Regional Office of the Plaintiff, Securities and Exchange Commission (the “Commission”). I submit this Declaration in support of the Commission’s Motion for Partial Summary Judgment as to Defendant Eric Dany. I am fully familiar with the facts and circumstances herein.

2. Appended hereto as Exhibit 1 is a true and correct copy of the Proposed Joint Pretrial Order that the remaining parties in this case filed with the Court on May 20, 2016, which includes stipulations of fact in Section VII.

3. Appended hereto as Exhibit 2 is a true and correct copy of relevant excerpts from the deposition transcript of Todd Weintz on February 23, 2016.

4. Appended hereto as Exhibit 3 is a true and correct copy of relevant excerpts from the deposition transcript of William Kaitz on April 6, 2016.

5. Appended hereto as Exhibit 4 is a true and correct copy of relevant excerpts from the investigative testimony of Defendant Dany, taken on September 23, 2013.

6. Appended hereto as Exhibit 5 is a true and correct copy of an e-mail sent by Kevin Finn, Dany's agent, to Kaitz, on March 27, 2013, forwarding an endorser contract Dany had prepared for his retention as endorser for the Norstra promotional campaign. The document was produced to the staff of the Commission during the course of the investigation in this matter and is Bates stamped SECLIT-000007547 to SECLIT-000007549.

7. Appended hereto as Exhibit 6 is a true and correct copy of the contract Dany prepared, titled Investor Relations Project Agreement, governing his retention by Full Service Media as endorser for the Norstra e-mail promotional campaign and signed by William Kaitz as of April 1, 2013. This document was produced to the staff of the Commission during the course of this investigation of this matter, and bears the Bates Number SECLIT-000009778 to SECLIT-000009779.

8. Appended hereto as Exhibit 7 is a true and correct copy of an e-mail sent by Dany to William Kaitz on June 5, 2013, attaching the contract Dany prepared, titled Investor Relations Project Agreement, governing his retention by Full Service Media as endorser for the Norstra print promotional campaign. This document was produced to the staff of the Commission during the course of the investigation of this matter, and bears the Bates Number SECLIT-000002428 to SECLIT-000002430.

9. Appended hereto as Exhibit 8 is a true and correct copy of the Interrogatory Responses of Defendant Dany, verified January 28, 2016, which indicates the compensation he earned from renting his mailing list for use in connection with the Norstra promotional campaign.

10. Appended here as Exhibit 9 is a true and correct copy of a landing page created for the Norstra E-mailer promotion, with a disclaimer dates as of June 3, 2013. This document was produced to the staff of the Commission during the course of the investigation of this matter, and bears the Bates Number SECLIT-000096461 to SECLIT-000096474.


11. Appended hereto as Exhibit 10 is a true and correct copy of a print version of the Norstra promotional campaign, the Mailer, with a disclaimer on page 11 dated as of June 7, 2013. This document was produced to the staff of the Commission during the course of the investigation of this matter, and bears the Bates Number SECLIT000092728 to SECLIT-000092743.

12. Appended hereto as Exhibit 11 is a true and correct copy of relevant excerpts from the investigative testimony of Defendant Dany taken on February 10, 2014.

13. Appended hereto as Exhibits 12 and 13 are true and correct copies of receipts for payment received by Defendant Dany from Full Service Media for endorser services Dany provided in connection with the Norstra promotional campaign. These documents were produced to the staff of the Commission by Dany in the course of the investigation of this matter, and bear the Bates Number SECLIT-000018430 and SECLIT-000018431, respectively.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 17, 2016
New York, New York



Jorge G. Tenreiro